

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO et al.

vs.

Case No.: 5: 21-cv-844-FB

GREGORY W. ABBOTT, in his official
capacity as the Governor of Texas, et al.

MOTION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Michael C. Keats, applicant herein, and

moves this Court to grant admission to the United States District Court for the Western District of Texas pro hac vice to represent Plaintiffs LA UNIÓN DEL PUEBLO ENTERO, SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT, MEXICAN AMERICAN BAR ASSOCIATION OF TEXAS, TEXAS HISPANICS ORGANIZED FOR POLITICAL EDUCATION, JOLT ACTION, WILLIAM C. VELASQUEZ INSTITUTE, and FIEL HOUSTON INC.

in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of) Fried, Frank, Harris, Shriver & Jacobson LLP with offices at:
Mailing address: One New York Plaza
City, State, Zip Code: New York, New York 10004
Telephone: (212) 859-8000 Facsimile: (212) 859-4000
Email: michael.keats@friedfrank.com
2. Since January 23, 1996, Applicant has been and presently is a member of and in good standing with the Bar of the State of New York.
Applicant's bar license number is 2720860.

3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>Supreme Court</u>	<u>October 3, 2016</u>
<u>First Circuit</u>	<u>February 6, 1996</u>
<u>Second Circuit</u>	<u>January 30, 2019</u>
<u>Ninth Circuit</u>	<u>September 21, 2000</u>
<u>Tenth Circuit</u>	<u>April 9, 2014</u>
<u>D.C. Circuit</u>	<u>July 29, 2016</u>
<u>Southern District of New York</u>	<u>April 20, 1999</u>
<u>Eastern District of New York</u>	<u>April 20, 1999</u>
<u>United States Tax Court</u>	<u>February 18, 2020</u>
<u>New York State</u>	<u>January 23, 1996</u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: _____ on the _____ y of _____, _____.

Number: _____ on the _____ y of _____, _____.

Number: _____ on the _____ y of _____, _____.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

N/A

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Nina Perales, Mexican American Legal Defense and Educational Fund

Mailing address: 110 Broadway, Suite 300

City, State, Zip Code: San Antonio, TX 78201

Telephone: (210) 845-5147

Should the Court grant applicant's motion, Applicant shall tender the amount of \$~~500.00~~ pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Michael C. Keats to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Michael C. Keats

[printed name of Applicant]

/s/ Michael C. Keats

[signature of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 3rd day of September, 2021.

Michael C. Keats

[printed name of Applicant]

/s/ Michael C. Keats

[signature of Applicant]